



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

December 27, 2018

ROBERT PHILLIPS, III, TREASURER  
ROSS SPANO FOR CONGRESS  
10101 BLOOMINGDALE AVENUE SUITE 201  
RIVERVIEW, FL 33578

**Response Due Date**  
**01/31/2019**

IDENTIFICATION NUMBER: C00676668

REFERENCE: 30 DAY POST-GENERAL REPORT (10/18/2018 - 11/26/2018)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 3 item(s):

1. Schedule A of your report discloses contributions through a conduit but fails to disclose the original earmarked contributions. Please be advised that when a committee receives an earmarked contribution(s) through an allowable conduit, each individual contribution should be itemized when the individual's total contributions to your committee aggregate over \$200 per election cycle. This itemization must include the full name, address, occupation, and employer of the individual contributor along with the date the contribution was received by the conduit. Any un-itemized contributions from individuals received through the conduit should be included in your totals on Line 11(a)(ii) of the Detailed Summary Page. Contributions from political party committees, PACs, authorized committees, or any political committee must be itemized, regardless of the amount contributed.

In addition, the total contribution(s) received through the conduit should be itemized on Schedule A as a memo entry. The conduit's full name and address (and occupation and employer if the conduit is an individual) must also be provided, along with the date the contribution(s) was received by your committee and the total amount of earmarked contributions received from the conduit. Please amend your report to include the missing information. If itemization is not necessary, please indicate so in an amendment to this report. (11 CFR §§ 110.6(c)(2) and 104.3(a)(3))

2. Schedule A of your report indicates that your committee may have failed to

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file one or more of the required 48-hour notices regarding "last minute" contributions (to include loans, in-kind contributions, and advances) received by your committee after the close of books for the 12 Day Pre-General Report (see attached). A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. The failure to file 48-hour notices may result in civil money penalties or legal enforcement action. (11 CFR § 104.5(f))

If any contribution of \$1,000 or more was incorrectly reported, you must amend your original report with the clarifying information. For each contribution received by a joint fundraising representative and subsequently transferred to your committee, please ensure that your report discloses the original date of receipt of the contribution by the joint fundraising representative in a memo entry supporting the transfer. The entry for the transfer itself should show the date the contribution was transferred to your committee by the joint fundraising representative.

3. Your committee filed 48-hour notices reporting the following "last minute" contributions (see attached). However, these contributions do not appear on Schedule A of this report. Please amend your report to include these contributions or provide an explanation of these apparent discrepancies. (11 CFR § 104.3(a)(4)(i)) For each contribution received by a joint fundraising representative and subsequently transferred to your committee, please ensure that your report discloses the original date of receipt of the contribution by the joint fundraising representative in a memo entry supporting the transfer. The entry for the transfer itself should show the date the contribution was transferred to your committee by the joint fundraising representative.

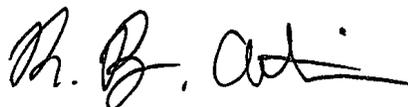
**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

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Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. For additional information about the report review process or specific filing information for your committee type, please visit <http://transition.fec.gov/rad/>. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1196.

Sincerely,

A handwritten signature in black ink, appearing to read "B. B. Austin". The signature is fluid and cursive, with a prominent initial "B." and a long, sweeping underline.

Bradley Austin  
Senior Campaign Finance Analyst  
Reports Analysis Division

**Missing 48-Hour Notices**  
**Ross Spano for Congress (C00676668)**

<b>Contributor Name</b>	<b>Date</b>	<b>Amount</b>	<b>Election</b>
James, Virginia	10/18/18	\$2,700.00	G2018
Lott, Dianna	10/23/18	\$2,700.00	G2018
Lott, Rick A.	10/23/18	\$1,700.00	G2018

**Incorrectly Reported Receipts on 48-Hour Notices  
Ross Spano for Congress (C00676668)**

**48-Hour Notices Filed/Contributions Not Disclosed on Schedule A**

<b>Contributor Name</b>	<b>Date</b>	<b>Amount</b>
Lott, Dianna	10/23/18	\$2,200.00
Lott, Rick	10/23/18	\$2,200.00